



IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA

HASSIE DEMOND KNOWLIN

Plaintiff,

VS,

No. 1:20CV¹⁰⁵~~115~~

LEXISNEXIS,

TRANS UNION,

EQUIFAX,

EXPERIAN,

US BKPT CT NC

Defendant.

COMPLAINT

PRELIMINARY STATEMENT

1. This is an action for damages brought from violations of the Fair Credit Reporting Act (FCRA) 15 U.S.C. §1681 *et seq.*

JURISDICTION

2. The jurisdiction of this Court is conferred by 15 U.S.C. §1681p.

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FACTUAL ALLEGATIONS

2. Defendants LexisNexis initiated many pulls of Plaintiff's credit reports from Trans Union, Equifax, Experian without permissible purpose. These pulls have become reportings in the public record that have been considered negative accounts on my credit reports. TRANS UNION, EQUIFAX, EXPERIAN allowed LEXISNEXIS and US BKPT CT NC to continuously report inaccurate information in plaintiffs report for more than two years which has damaged plaintiffs ability to do business and his reputation as a creditable consumer

**VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), 15 U.S.C. §1681
WILLFUL NON-COMPLIANCE BY DEFENDANT DEBT COLLECTOR, L.L.C.**

3. Plaintiff is a consumer within the meaning of the FCRA, 15 U.S.C. §1681a(c).

4. LEXISNEXIS and US BKPT CT NC. is a furnisher of information within the meaning of the FCRA, 15 U.S.C. §1681s-2.

5. LEXISNEXIS and US BKPT CT NC. willfully violated the FCRA. LEXISNEXIS and US BKPT CT NC violations include, but are not limited to, the following:

(a) LEXISNEXIS and US BKPT CT NC. willfully violated 15 U.S.C. §1681b(f)

(b) by obtaining Plaintiff's consumer report without a permissible purpose as defined by 15 U.S.C. §1681b.

WHEREFORE, Plaintiff demands judgment for damages in the amount of \$1,000 against LEXISNEXIS and US BKPT CT NC. for actual or statutory damages, and punitive damages, attorney's fees and costs, pursuant to 15 U.S.C. §1681n.

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4 **VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), 15 U.S.C. §1681**
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6 **NEGLIGENT NON-COMPLIANCE BY DEFENDANT TRANS UNION, EQUIFAX,**
7 **EXPERIAN,**
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10 6. Plaintiff is a consumer within the meaning of the FCRA, 15 U.S.C. §1681a(c).

11 7. TRANS UNION, EQUIFAX, EXPERIAN, is a furnisher of information within the
12 meaning of the FCRA, 15 U.S.C. §1681s-2.

13 8. TRANS UNION, EQUIFAX, EXPERIAN. negligently violated the FCRA. Defendants
14 violations include, but are not limited to, the following:

15 (a) TRANS UNION, EQUIFAX, EXPERIAN negligently violated 15 U.S.C. §1681b (f)
16 by reporting information in Plaintiff's consumer report without a permissible purpose as
17 defined by 15 U.S.C. §1681b.
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19 WHEREFORE, Plaintiff demands judgment for damages in the amount of \$1,000 against
20 TRANS UNION, EQUIFAX, EXPERIAN. for actual damages, and attorney's fees and
21 costs, pursuant to 15 U.S.C. § 1681o.
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25 **WHEREFORE,** Plaintiff demands judgment for damages against TRANS UNION,
26 EQUIFAX, EXPERIAN. and \$2,000 for actual or statutory damages, and punitive
27 damages, fees and costs, pursuant to 15 U.S.C. §1681n (a) (3) and 15 U.S.C. §1681o (a)
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4 **DEMAND FOR JURY TRIAL**

5 Plaintiff hereby demands a trial by jury of all issues so triable as a matter of law.
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7 Respectfully submitted this 3rd day of Feb, 2020

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